UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22mj03367 Goodman

UNITED STATES OF AMERICA	FILED BY dgj D.C.
VS.	
LANDON KENT,	Aug 15, 2022
Defendant.	ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA mia

CRIMINAL COVER SHEET

- 1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)?
- 2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)?

Respectfully submitted,

JUAN ANTONIO GONZALEZ UNITED STATES ATTORNEY

BY:

YARA DODIN

Assistant United States Attorney

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT for the

for the		
Southern District of Florida		
United States of America) v.) LANDON KENT,) Defendant(s)	se No. 22mj03367 Goodman	
CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS		
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.		
On or about the date(s) of June 24, 2022 - July 31, 2022 in the	ne county of in the	
Southern District of Florida and elsewhere, the defendant(s) violated:		
Code Section	Offense Description	
18 U.S.C. § 875(c) Interstate Transmission of Threat to Kidnap or Injure		
This criminal complaint is based on these facts: SEE ATTACHED AFFIDAVIT.		
✓ Continued on the attached sheet.		
	Sophak Signature SA Sophak Thach, FBI Printed name and title	
Attested to by the Applicant in accordance with the requirements of Fed.R.Crim. 4.1 by WhatsApp.		
Date: 8/15/2022	Judge's signature	
City and state: Miami, Florida Hor	norable Jonathan Goodman, United States Magistrate Judge Printed name and title	

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sophak Thach, being duly sworn, do hereby depose and state the following:

BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), United States Department of Justice, currently assigned to the Joint Terrorism Task Force of the FBI Miami Field Division. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code. That is, I am an officer of the United States who is empowered by law to conduct investigations of and make arrests for violations of Title 18 of the United State Code. I have been a Special Agent with the FBI since June of 2008. Among my duties as a Special Agent, I am responsible for the investigation of a variety of violations of federal laws related directly to threats to life and stalking. I also have received extensive training as a Crisis Negotiator.
- 2. This Affidavit is made in support of a criminal complaint charging Landon Kent ("KENT") with transmission of interstate threats to injure the person of another, in violation of Title 18, United States Code, Section 875(c).
- 3. I am familiar with the facts and circumstances set forth in this Affidavit as a result of my participation in the investigation and my experience, training, and background as a Special Agent with the FBI. The information contained within this Affidavit is based upon my personal knowledge, as well as information and documentation that I obtained from other law enforcement officers and witnesses who have firsthand knowledge of the events described herein. This Affidavit is provided for the limited

purpose of establishing probable cause in support of the criminal complaint and therefore does not contain all the facts known to me about this investigation.

PROBABLE CAUSE

- 4. The victim is an employee of Justice For Kids ("JFK"), a division of Kelley Kronenberg's Law firm located in Davie, Florida. JFK represents sexually abused and trafficked children. Occasionally, JFK represents adults who have been abused as a child. On October 20, 2020, the victim met with KENT for the first time at the victim's office to hear his claims of sexual abuse as a child in the West Virginia foster care system. The victim agreed to assist KENT with these claims. As a part of the victim's representation of KENT and at KENT's request, the victim sent KENT all reports pertaining to the sexual abuse case.
- 5. On or about March 15, 2022, the victim received an email from KENT. In the email, KENT informed the victim he will be taking an indefinite hiatus from the claim. KENT stated, "I am in pain and I've been a bad friend. The process has ultimately led me to the understanding that I can't heal if I keep picking my scabs." KENT appeared to have been negatively affected by his review of the reports pertaining to his sexual assault.
- 6. On or about April 20, 2020, the victim received notification from JFK employees about harassing social media posts left the law firm's Instagram page. The posts referred to JFK kidnapping KENT and exploiting him. Out of concern for KENT, the victim hired Private Investigators ("PI") to conduct a welfare check on KENT at his Los Angeles apartment where he currently resides. The PI attempted to make contact with KENT without success. After the failed attempt, KENT made an Instagram post stating Kelley Kronenberg is

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trying to silence me. He further informed the victim that he would shoot any officers that come to his house in the future, as described in more detail below.

- 7. On or about April 12, 2022, the victim sent KENT an email to notify KENT of the termination of their attorney-client relationship. Within a matter of days, KENT sent hundreds of messages to KENT through texts, voicemails, and emails. Between on or about June 24, 2022, and continuing through on or about July 31, 2022, the victim estimates receiving approximately 500 to 600 threatening messages from KENT sent through text, emails, and voicemails.
- 8. On or about June 24, 2022, the victim received email communications from KENT's email account landonkent91@gmail.com. Examples of such communications include the following:
 - a. A June 24, 2022 at 12:00 PM email stating, "Gonna charge me, pedophile bitches, or am I gonna have to come pay [J] and [J]¹ a visit. I double dog dare you."
 - b. A June 24, 2022 at 11:58 AM email stating, "You're Florida, you piece of shit trash. We're Goddamn California, motherfucker. You almost made widows of those two poor idiots that you sent to stalk my building. You send someone into my home again, I am going to shoot them dead. Do not be responsible for a

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¹ J and J are the victim's daughters, one of whom has also been on the receive end of KENT's threatening voicemails.

- death, you scum. You're already responsible for the rape and exploitation of over 100 children. Take me to court. I dare you. You don't have the balls."
- c. A June 24, 2022 at 11:53 AM email stating, "[JG]² goes to the University of Florida. I wonder if she likes impromptu visitors, I'm willing to bet not. Someone should cut off her nose to make her face more symmetrical."
- d. A June 27, 2022 at 6:49 PM stating, "Still waiting for those charges, you ugly liver spotted twat."
- 8. From June 24, 2022 to August 05, 2022, the victim received approximately 334 text messages from Kent's telephone number, 310-709-7115. Examples of such text messages include the following:
 - a. A June 24, 2022 at 4:17 PM text stating, "You try to send those men back to my house, I will shoot them. LAPD will not be honoring any of your complaints. You call them again, you will be back charged for wasting my city's police resources. If you do not stop sending LAPD to my house, I will send an armed swat team to yours."
 - b. A June 24, 2022 at 12:32 PM text stating" You better stop sending these men to invade my home, Justin, or I'm going to kill them"
 - c. A June 27, 2022 at 10:17 AM text stating, "What's matter Justin? Are you afraid of a little fame? I promise you, your daughters life will never be the same again.

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² JG is the victim's daughter.

- Charge me now, you piece of shit bitch. Sending these fuckers here again? If I were you I would recommend that they come wearing Kevlar."
- d. A June 29, 2022 at 9:15 PM text stating, "You fucking piece of shit. You got something coming for you. The biggest mistake you made was letting me walk out of that office you pedophile bitch. [J] and [J]? I'm coming to visit your daughter you stupid fucker. I'll kill you it you come in my home again."
- 9. On or about July 30, 2022 and July 31, 2022, the victim received approximately 25 voice messages from KENT. Examples of such voice messages include the following:
 - a. A June 30, 2022 voice message stating, "Stay away. No one is afraid of ya but I will kill ya. Let me say it twice. I will kill ya. Don't come in my house."
 - b. A June 30, 2022 voice message stating, "I wonder what it would like to fucken pull your god your fucken wife's eyeballs out from her fucken socket. You sick motherfucker."
 - c. A June 30, 2022 voice message stating, "You need to be removed from our society. If we lived 100 years or so, you would have been put to death. You'll be killed. I'll be assure your whole family was killed to remove any your trace of your disgusting DNA seeping over to our society."
 - d. A June 31, 2022 voice message stating, "Could imagine what it would look like to cut your god damn daughter's tongue out. You stupid motherfucker."
 - e. A June 31, 2022 voice message stating, "Come into my house. I'll kill you motherfucker. I will kill your daughter. I will kill your wife. I will kill anyone

that's in my house. I can kill you for being in my house. You stupid motherfucker."

CONCLUSION

10. Based on the foregoing facts, I respectfully submit there is probable cause to believe that on or about June 24, 2022, in the Southern District of Florida, KENT transmitted an interstate threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c).

FURTHER YOUR AFFIANT SAYETH NAUGHT.

SOPHAR THACK, SPECIAL AGENT FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by WhatsApp this 15th day of August 2022.

HONORABLE JONATHAN GOODMAN UNITED STATES MAGISTRATE JUDGE